

DEPARTMENT OF SOCIAL SERVICES

744 P Street, Sacramento, CA 95814



January 2, 1992

ALL-COUNTY LETTER NO. 92-02

TO: ALL COUNTY WELFARE DIRECTORS
ALL COUNTY GAIN COORDINATORS

SUBJECT: CONCURRENT ENROLLMENT

REFERENCE: ALL-COUNTY INFORMATION NOTICE NO. I-30-89

The purpose of this letter is to inform counties of the opportunity to participate in the existing Concurrent Enrollment Demonstration Project (CEDP) in the Greater Avenues for Independence (GAIN) Program.

All-County Information Notice (ACIN) I-30-89, dated May 12, 1989, invited counties to participate in the CEDP. As a result, nine counties are now operating demonstration projects which test various concurrent enrollment models. These projects are operating under a statute and regulations waiver which expires on December 31, 1992. In response to county requests to implement concurrent enrollment immediately, we are allowing all counties the opportunity to implement concurrent enrollment by participating in the CEDP under the existing waiver. It is our intent to have necessary statutory and regulatory changes in place January 1, 1993 to authorize continuation of concurrent enrollment after the waiver expires.

Additional counties which are interested in participating should prepare the project proposal according to the attached guidelines. In reviewing the guidelines, please note that the extensive data collection and reporting requirements previously required in ACIN I-30-89 have not been included. Upon approval by the State Department of Social Services, the demonstration projects may begin anytime, but no later than July 1, 1992. There is no additional funding for the CEDP.

In preparing a CEDP proposal, counties should keep in mind that not all participants may be successful in a concurrent assignment. Counties which are currently participating in the CEDP have found that adding a training activity to basic education has been too difficult for some participants. For example, an individual who is lacking basic education skills and who has never been employed may not be successful in a concurrent enrollment assignment. Also, counties have found that it is important to structure concurrent assignments so that hours of participation combined with travel time are reasonable. Finally,

counties are encouraged to "integrate" concurrent enrollment assignments where possible. An integrated component combines basic education and post-assessment training activities into one component which is provided by a single provider.

The counties which are currently participating in the CEDP are: Butte, Fresno, Kern, Kings, Merced, San Mateo, Santa Clara, Stanislaus and Tulare. Please contact any of these counties for their perspectives on concurrent enrollment.

If your county is interested in participating in the CEDP, please send two copies of your project proposal to:

Department of Social Services
GAIN and Employment Services
Operations Bureau
744 P Street, M.S. 6-136
Sacramento, CA 95814

Please submit your proposal at least 60 days prior to the intended start-up of your project. The department will make every effort to approve plans as quickly as possible. Counties which are currently participating in the CEDP and wish to make changes to their existing projects must submit a letter to the GAIN and Employment Services Operations Bureau (GESOB) describing the proposed change and why it is being made. Any proposed change must be approved by GESOB prior to implementation.

If you have any questions, please contact your GAIN and Employment Services Operations Bureau analyst.



DENNIS J. BOYLE
Deputy Director

Attachment

cc: CWDA

**CONCURRENT ENROLLMENT DEMONSTRATION PROJECT
PROGRAM GUIDELINES**

I. INTRODUCTION

The purpose of the Concurrent Enrollment Demonstration Project (CEDP) is to test the effectiveness of allowing GAIN participants who are in need of basic education* to concurrently participate in assessment and post-assessment job, training and educational services. Counties wishing to participate in the CEDP must submit proposals prepared in accordance with these guidelines and approved by the State Department of Social Services (SDSS).

Counties with approved project proposals may begin their projects anytime, but no later than July 1, 1992; the projects will continue until December 31, 1992.

II. COUNTY REQUIREMENTS

A. Demonstration Methodology

It is recommended that counties operating the CEDP test the program objectives listed below. One of the methods a county may choose for this purpose is to specify a comparison or control group. However, other methods are acceptable, such as comparison to previous experience.

Upon completion of the CEDP, counties are required to submit a report, in narrative form, on the results of the project. This report is due to SDSS no later than March 15, 1993.

B. Project Objectives

The CEDP objectives are to determine if:

1. Concurrent enrollment results in the expenditure of assessment funds for people who would have gone off aid prior to assessment under the current flow.
2. Participants concurrently enrolled in education and training get jobs sooner.
3. Persons who obtain early employment without completing education will return to AFDC due to lack of basic skills.

* Basic education includes adult basic education, English-as-a-second language and general educational development (GED) instruction as determined pursuant to Manual of Policies and Procedures (MPP) Section 42-761.32.

4. Participants concurrently enrolled in education and training are more motivated and as a result do not drop out of education activities.
5. Participants lacking basic literacy are able to successfully participate in and complete training activities.
6. Participants lacking basic literacy are able to successfully complete the assessment process.

C. County Proposal Requirements

Counties wishing to participate in the CEDP may want to test various models of concurrent enrollment or focus on different target groups. In preparing a CEDP proposal, please include the following:

1. Proposal Overview and Summary
 - a. A brief statement of the problem(s) in your county that the project will address and a statement of the goals and objectives to be achieved. The goals and objectives may coincide with the project objectives listed in Section B above or with other goals specified in the county's CEDP proposal.
 - b. The anticipated outcome(s) that will demonstrate what the county expects the project to accomplish.
 - c. A description of the program flow.
2. Description of Concurrent Enrollment Procedures
 - a. A description of the criteria for selecting the individuals eligible for concurrent enrollment.
 - b. An estimated number of participants to be served in the project.
 - c. A description of how the decision to use concurrent enrollment is reached, including the role of the participant, the GAIN case manager and the assessor. This section must assure that the participant wants to participate in the CEDP and must specify the individual responsible for making the final decision.
 - d. A description of when assessment will be conducted.
 - e. A listing of components to be combined as concurrent assignments and whether they will be integrated.

III. PROGRAM PARTICIPATION REQUIREMENTS

In order to conduct the CEDP, the Director has waived the necessary statutes and regulations in accordance with Welfare and Institutions Code Section 18204. While selected provisions of the GAIN statute and regulations have been waived for the project, counties must assure that CEDP participants meet the GAIN program requirements defined below.

A. Program Flow

1. Under the CEDP, counties may choose one or both of the following program flow options:

- a. Enrollment in basic education prior to assessment

Following appraisal, GAIN participants would be enrolled in needed basic education, followed by enrollment in assessment and appropriate post-assessment activities. Participants would not be required to complete their basic education activity prior to enrollment in assessment.

Also, counties may waive the requirement to complete three weeks of job club/job search prior to assessment under this option.

- b. Enrollment in basic education following assessment (up-front assessment)

Following appraisal, GAIN participants would go to assessment, followed by enrollment in needed basic education and appropriate post-assessment training or job services. Because all participation under this option takes place after assessment, the providers' standard for making satisfactory progress is applicable.

Under this option, participants would not complete the required three weeks of job club/job search prior to enrollment in assessment.

2. The following provisions apply to both options:

- a. The employment plan and contract resulting from assessment should combine needed basic education with appropriate post-assessment training and/or job search activities.

- b. County participation in the concurrent enrollment demonstration project does not supercede the county's flexibility to make assignments to appropriate post-assessment activities based on the employment plan.

FOR EXAMPLE: ...nothing precludes a person from being assigned to job search activities while participating in CEDP, to the extent it is consistent with their Employment Plan.

- c. Regardless of the appraisal results, if the assessment and employment plan indicate that a lower level for basic math is appropriate, counties may modify the participation requirements to specify those needed to meet the employment goal.
- d. The two-year limit on post-assessment education specified in MPP 42-730.54 does not apply to basic education activities in the CEDP.
- e. Post-assessment education and training activities may be integrated into one component. In other words, basic education and training activities enrolled in following assessment do not have to be separate activities, such as basic education in the morning and training in the afternoon, and can be provided by a single provider.

Counties choosing to offer an integrated component must ensure that in the event the participant fails/refuses to participate in the integrated component without good cause, the conciliation plan requires, at a minimum, participation in the needed basic education activity. If conciliation is not successful and a financial sanction is imposed, the individual must participate in at least the needed basic education to cure the sanction.

B. Program Requirements

- 1. The following program requirements apply to all participants in the CEDP:
 - a. It is intended that basic education will continue to be emphasized and that counties' CEDP plans will encourage completion of needed basic education activities.
 - b. Assignment to concurrent enrollment can be made only if the participant agrees to participate in concurrent enrollment.

- c. In accordance with MPP 42-772.7, teen parents who do not have a high school diploma or equivalent are not eligible to participate in concurrent enrollment, unless it has been determined that the teen parent is not making satisfactory progress as specified in MPP 42-772.721.
2. The following requirements apply to participants who are not in an integrated component:
 - a. Participants who fail or refuse to comply with program requirements in the basic education component will be subject to cause determination and sanction in accordance with MPP Sections 42-781 and 42-786.
 - b. Training activities entered into after assessment and pursuant to an employment plan will be terminated if:
 - a participant fails or refuses to comply with program requirements in the assigned training activity; or,
 - a participant fails to meet the criteria for successful completion of the training activity, as specified in MPP Sections 42-774.13 and .3.
 - c. Participants who terminate post-assessment activities must continue with the basic education activity.
3. The following requirements apply to participants in an integrated component:
 - a. Participants who fail or refuse to comply with program requirements without good cause will be subject to cause determination and sanction in accordance with MPP Sections 42-781 and 42-786. The conciliation plan must, at a minimum, provide for participation in the needed basic education activity.
 - b. If conciliation is not successful and a financial sanction is imposed, the individual must agree to participate in the needed basic education to cure the sanction.

C. Participant Notification

Participants to be included in the CEDP shall be informed of all of the participation requirements prior to the signing of any participant contract(s).